

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**MEDIENT STUDIOS, INC., FONU2,
INC., MANU KUMARAN, JOEL A.
“JAKE” SHAPIRO, and ROGER
MIGUEL,**

Defendants.

**Case No. 4:16-cv- 00253
WTM-GRS**

**DECLARATION SHOWING SUBSTITUTED SERVICE OF PROCESS
WITH RESPECT TO MEDIENT STUDIOS, INC.**

I, W. Shawn Murnahan, Esq., hereby declare as follows, pursuant to 28 U.S.C. § 1746:

1. I am over 21 years of age and am a citizen of the United States. I have resided in Georgia from October 1998 through the present. I am a licensed attorney and have been a member of the State Bar of Georgia since June 6, 1999 and a member of the Ohio bar since 1995. I am a Senior Trial Counsel in the Atlanta Regional Office of the United States Securities and Exchange Commission (“SEC”),

where I have been employed since December 2002. I represent the Plaintiff SEC in the above-captioned action.

2. I have personal knowledge of the matters set forth in this Affidavit.

3. On September 23, 2016, the SEC filed the above-captioned lawsuit against Medient Studios, Inc. (“Medient”), Fonu2, Inc., Manu Kumaran, Joel A. Shapiro, and Roger Miguel.

4. Defendant Medient is a Nevada Corporation with its principal place of business in Effingham County, Georgia.

5. Medient registered with the Georgia Secretary of State to conduct business in Georgia as a foreign corporation on August 15, 2013.

6. Medient has a registered agent according to the records of the Secretary of State of Georgia. The Secretary of State records reflect that the registered agent for Medient is Graham Bradstreet, and that service of process may be effected at 1635 Old River Road, Bloomingdale, GA, 31302, USA.

7. As counsel for the SEC, I attempted service of process at that address by registered mail and statutory overnight delivery to Graham Bradstreet. I was subsequently informed by the overnight delivery service that the company was no longer located there.

8. In a further attempt to obtain service, I also engaged a process serving agency that tracked Mr. Bradstreet to California. The process serving agency was successful in obtaining a phone number for Mr. Bradstreet, but despite speaking directly to the process server via phone, Mr. Bradstreet refused to identify his whereabouts or otherwise agree to accept service. The process serving agency was unable to physically locate Mr. Bradstreet.

9. Because intentional evasion has made it impossible for the SEC to serve Medient's registered agent, and Medient has not updated its location or identified a new registered agent with the Georgia Secretary of State, Medient has, therefore, failed to maintain a registered agent in Georgia, as required of foreign-state corporations under Georgia law.

10. Georgia Code Annotated § 9-11-4(e)(1) provides, under Georgia law, that a foreign corporation authorized to transact business in Georgia can be served through the Secretary of State when, for any reason, the registered agent cannot be served.

11. Pursuant to Georgia Code Annotated § 9-11-4(e)(1), on December 13, 2016, I provided the Georgia Secretary of State with a copy of the process, a completed Form SOP-1, a filing fee of \$10, and an affidavit to serve the Georgia Secretary of State as a statutory agent of Medient.

12. On December 22, 2016, I received a Certificate of Acknowledgement from the Georgia Secretary of State's office indicating that the service documents had been received and filed with that office. A true and correct copy of the Certificate of Acknowledgement is attached as an exhibit to this Declaration.

13. Plaintiff SEC respectfully informs the Court that pursuant to Fed. R. Civ. P. 4(h)(1)(A), 4(e)(1), and Georgia Code Annotated § 9-11-4(e)(1), Defendant Medient has been served "under state law for serving a summons in an action brought in courts of general jurisdiction in the state where the district court is located or where service is made." Fed. R. Civ. P. 4(e)(1).

Dated this 9th day of January, 2017.

/s/ W. Shawn Murnahan
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